

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 01**

UNITED STATES POSTAL SERVICE

and

NATIONAL ASSOCIATION OF LETTER
CARRIERS, BRANCH 92 A/W NATIONAL
ASSOCIATION OF LETTER CARRIERS

Case 01-CA-145800

NOTICE OF INTENT TO AMEND COMPLAINT

Pursuant to Section 102.17 of the Rules and Regulations of the National Labor Relations Board (the Board), Counsel for the General Counsel intends to amend the Complaint and Notice of Hearing issued on June 30, 2015 as follows:

Paragraph 1 will be amended to add subparagraphs (c) and (d) to read as follows:

(c) The second amended charge in this proceeding was filed by Branch 92 on August 13, 2015, and a copy was served on Respondent by E-Service on August 13, 2015.

(d) The third amended charge in this proceeding was filed by Branch 92 on September 25, 2015, and a copy was served on Respondent by E-Service on September 28, 2015.

Paragraph 8(b) will be amended to read as follows:

(b) By written request dated January 22, 2015, Branch 92 requested that Respondent furnish it with witness statements that Respondent considered to be the evidence that formed the basis for putting employee Kimberly Stokes out on emergency leave.

Paragraph 11 will be amended to read as follows:

11. (a) About February 12, 2015 and about February 25, 2015, Respondent informed Branch 92 that it would not provide the information described above in paragraph 8 unless Branch 92 signed the confidentiality agreements Respondent tendered, respectively, on those dates.

(b) About February 25, 2015, verbally, and about March 16, 2015, in writing, Branch 92 informed Respondent that it was not required to execute the confidentiality agreements referred to above in paragraph 11(a) in order to receive the information described above in paragraph 8.

Paragraph 12 will be amended to read as follows:

12. (a) Since about February 12, 2015, Respondent has failed to continue in effect all of the terms and conditions of the agreement described in paragraph 7 above, by requiring that Branch 92 execute the confidentiality agreements described in paragraph 11(a) above, contrary to Article 31 of the agreement described in paragraph 7 above.

(b) The terms and conditions of employment described above in paragraph 12(a) above are mandatory subjects for the purposes of collective bargaining.

(c) Respondent engaged in the conduct described above in paragraph 12(a) without the Union's consent.

Paragraph 13 will be amended to read as follows:

13. By the conduct described above in paragraph 11(a), Respondent has been failing and refusing to bargain collectively and in good faith with the exclusive collective-bargaining representative of its employees in violation of Section 8(a)(1) and (5) of the Act and within the meaning of the PRA.

Paragraph 14 will be amended to read as follows:

14. By the conduct described above in paragraph 11(a), Respondent has failed to bargain collectively and in good faith within the meaning of Section 8(d) of the Act in violation of Section 8(a)(5) of the Act and within the meaning of the PRA.

Dated: September 28, 2015

/s/ Daniel F. Fein
DANIEL F. FEIN
COUNSEL FOR THE GENERAL COUNSEL
NATIONAL LABOR RELATIONS BOARD
REGION 01